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Attorneys for Defendants:
IRVING J. PINTO 1996 GRANTOR RETAINED
ANNUITY TRUST; IRVING J. PINTO 1994
GRANTOR RETAINED ANNUITY TRUST;
SIDNEY KAPLAN, in his/her capacity as Trustee
of the Irving J. Pinto 1996 Grantor Retained
Annuity Trust and the Irving J. Pinto 1994
Grantor Retained Annuity Trust; ESTATE OF IRVING
J.PINTO; and JAMIE PINTO, in his capacity as
Personal Representative of the Estate of Irving J. Pinto.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	
Plaintiff,	Adv. Pro. No. 10-04744 (SMB)
v.	
IRVING J. PINTO 1996 GRANTOR RETAINED ANNUITY TRUST; IRVING J. PINTO 1994 GRANTOR RETAINED ANNUITY TRUST; SIDNEY KAPLAN, in his/her capacity as Trustee of the Irving J. Pinto 1996 Grantor Retained Annuity Trust and the Irving J. Pinto 1994 Grantor Retained Annuity Trust; ESTATE OF IRVING J.PINTO; and JAMIE PINTO, in his capacity as Personal Representative of the Estate of Irving J. Pinto,	
Defendants.	

**NOTICE OF PRESENTMENT OF ORDER GRANTING MOTION OF DEFENDANTS'
COUNSEL ROBERT M. McCLAY AT THE LAW FIRM OF McCLAY•ALTON, P.L.L.P.
AND DEFENDANTS' COUNSEL MARVIN C. INGBER FOR AN ORDER PURSUANT
TO RULE 2090-1(e) OF THE LOCAL BANKRUPTCY RULES TO REMOVE BRUCE S.
SCHAEFFER AS COUNSEL TO DEFENDANTS**

PLEASE TAKE NOTICE that upon the annexed motion of Robert M. McClay, McClay•Alton, P.L.L.P. and Marvin C. Ingber, the undersigned will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on June 8, 2015 at 12:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of

the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the ECF docket number to which the filing relates shall be included in the upper right corner of the caption of all objections.

Dated: St. Paul Minnesota

April 22, 2015

By: /s/ Robert M. McClay
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Dated: Palm Springs, CA

April 22, 2015

By: /s/ Marvin C. Ingber
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IRVING J. PINTO 1996 GRANTOR
RETAINED ANNUITY TRUST; IRVING J.
PINTO 1994 GRANTOR RETAINED
ANNUITY TRUST; SIDNEY KAPLAN, in
his/her capacity as Trustee of the Irving J.
Pinto 1996 Grantor Retained Annuity Trust
and the Irving J. Pinto 1994 Grantor Retained

*Annuity Trust; ESTATE OF IRVING J. PINTO;
and JAMIE PINTO, in his capacity as
Personal Representative of the Estate of Irving
J. Pinto.*

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